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13 Attorneys for The Roman Catholic Archbishop of  
14 San Francisco

15 UNITED STATES BANKRUPTCY COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 In re

18 THE ROMAN CATHOLIC ARCHBISHOP  
OF SAN FRANCISCO,

19 Debtor and  
20 Debtor in Possession.

Case No. 23-30564

Chapter 11

**DECLARATION OF SARA BETH A.R.  
KOHUT IN SUPPORT OF DEBTOR'S  
MOTION FOR ENTRY OF AN ORDER  
REFERRING PARTIES TO GLOBAL  
MEDIATION, APPOINTING MEDIATOR  
AND GRANTING RELATED RELIEF**

23 Date: June 13, 2024  
24 Time: 1:30 p.m.  
Location: via Zoom  
25 Judge: Hon. Dennis Montali

1 I, Sara Beth A.R. Kohut, declare as follows:

2 1. I am an attorney, duly admitted and in good standing in the State of Delaware, the  
3 Commonwealth of Pennsylvania, the United States District Court for the District of Delaware, and  
4 the United States Court of Appeals for the Third Circuit. I have personal knowledge of the facts set  
5 forth herein, which are known by me to be true and correct, and if called as a witness, I could and  
6 would competently testify thereto.

7 2. This declaration is submitted in support of the *Motion for Entry of an Order*  
8 *Referring Parties to Global Mediation, Appointing Mediator and Granting Related Relief* (the  
9 “Motion”) filed by The Roman Catholic Archbishop of San Francisco, debtor and debtor in  
10 possession (the “Debtor”) in the above-captioned chapter 11 case (the “Chapter 11 Case”). I give  
11 capitalized terms used but not defined in this declaration the same meanings ascribed to them in the  
12 Motion.

13 3. The Motion seeks to have The Honorable Christopher S. Sontchi (Ret.) appointed as  
14 a mediator in the above-captioned Chapter 11 Case. Concurrently with the filing of this declaration,  
15 the Debtor is submitting the Sontchi Declaration in support of the Motion. In the Sontchi  
16 Declaration, Judge Sontchi notes that he anticipates using my assistance to perform his duties as  
17 Mediator in this matter, subject to Court approval. I have been working as contract attorney for  
18 Judge Sontchi since August 2023.

19 4. In connection with Judge Sontchi’s proposed appointment as a Mediator, I have been  
20 provided with: (a) a confidential copy of the creditor mailing matrix filed under seal in this Chapter  
21 11 Case as ECF No. 119, (b) a list of Insurers, along with their counsel of record in this Chapter 11  
22 Case, if any, a copy of which list is appended to this declaration as Exhibit 1; and (c) a list of the  
23 Debtor’s professionals employed and compensated by the Debtor’s estate in this Chapter 11 Case,  
24 a copy of which list is appended to this declaration as Exhibit 2 (together with the creditor mailing  
25 matrix and the list described at 4(b), collectively, the “Schedule of Interested Parties”). I reviewed  
26 the Schedule of Interested Parties and my books and records to investigate my connections to any  
27 Interested Parties and disinterestedness.

28

1           5.       Upon my review, I have concluded that I do not have any conflicts with any of the  
2 entities listed on the Schedule of Interested Parties. To the best of my knowledge and based on the  
3 information available, I have no connection with the Debtor or any other party in interest in this  
4 Chapter 11 Case, other than as disclosed herein. Out of an abundance of caution, I disclose the  
5 following:

6               a.       Prior to June 2022, I was employed by the law firm Young Conaway Stargatt  
7 & Taylor, LLP (“YCST”). YCST represented the Catholic Diocese of Wilmington in its bankruptcy  
8 case in Delaware, and I was involved in that matter.

9               b.       YCST represented certain of the Insurers were listed as parties in interest in  
10 non-bankruptcy matters with which I was not involved. While at YCST, I represented clients who  
11 were future claimants’ representatives in mass tort bankruptcy cases and post-bankruptcy settlement  
12 trusts. Many of the Insurers listed as parties in interest in this Chapter 11 Case were creditors of the  
13 debtor(s) and/or trusts in those matters. I also advised the trustee of a subrogation trust, whose  
14 beneficiaries included certain of the Insurers.

15              c.       During my tenure at YCST, I represented a client in connection with patent  
16 litigation against Pitney Bowes and represented two entities in connection with data-breach  
17 notifications related to use of services by Blackbaud.

18              d.       As a contract attorney, I provided litigation-support services to a firm  
19 representing a bankruptcy debtor in litigation involving the California Franchise Tax Board.

20              e.       I have also worked on matters, bankruptcy and otherwise, involving many of  
21 the law firms and other professionals on the Schedule of Interested Parties. While a complete listing  
22 of those connections and connections referenced in paragraph 5(b) is not feasible, I do not believe  
23 any such connection impairs my disinterestedness in this matter.

24           6.       Additionally, in the interest of full disclosure, I assist Judge Sontchi in connection  
25 with his appointment as a mediator in *In re The Roman Catholic Diocese of Ogdensburg, New York*,  
26 pending in the United States Bankruptcy Court for the Northern District of New York (Case No. 23-  
27 60507-6-PGR).

7. I do not believe any of the matters described in the disclosures above impairs my disinterestedness in connection with assisting Judge Sontchi in his proposed role as Mediator in this Chapter 11 Case.

8. I am neither affiliated with, nor do I have any connection with, the Office of the United States Trustee or any of its employees.

9. I have not received any transfer, assignment, or pledge of property of the Debtor's estate or any of the holders of abuse claims as of the date of this declaration.

10. I have not shared or agreed to share with any other person any compensation to be paid with respect to this Chapter 11 Case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

5/14/2024

Executed on this \_\_\_\_ day of May 2024, at Wilmington, Delaware.

—DocuSigned by:

DocuSigned by:  
Sara Beth AR K...

~~C3879281B9A54DE...~~

Sara Beth A.R. Kohut

**Exhibit 1**

[Insurers]

<b><u>INSURANCE COMPANY</u></b>	<b><u>ATTORNEY NAME</u></b>	<b><u>FIRM</u></b>
Appalachian Insurance Company	Christina M. Lincoln	Robins Kaplan LLP
Appalachian Insurance Company	Melissa M. D'Alelio Taylore E. Karpa Schollard Michele N. Detherage	Robins Kaplan LLP
Appalachian Insurance Company	Harris B. Winsberg Matthew M. Weiss Matthew G. Roberts R. David Gallo	Parker, Hudson, Rainer & Dobbs LLP
Appalachian Insurance Company	Todd C. Jacobs John E. Bucheit	Parker, Hudson, Rainer & Dobbs LLP
Century Indemnity Company, Pacific Indemnity Company, and Westchester Fire Insurance Company	George Calhoun	IRFAH PLLC
Century Indemnity Company, Pacific Indemnity Company, and Westchester Fire Insurance Company	Alexander Potente Jason J. Chorley	Clyde & Co US LLP
Certain Underwriters of Lloyd's, London and Certain London Market Companies	Catalina J. Sugayan Yongli Yang Daniel James Michael Norton	Clyde & Co US LLP
Certain Underwriters of Lloyd's, London and Certain London Market Companies	Nathan Reinhardt Andrew Mina Russell W. Roten Jeff D. Kahane Betty Luu	Duane Morris LLP
Chicago Ins Co and Fireman's Fund Ins Co	Matthew C. Lovell	Nicolaides Fink Thorpe Michaelides Sullivan LLP
Chicago Ins Co, Fireman's Fund Ins Co, and Westport Ins Corp (FKA Employers Reinsurance Corp)	Matthew M. Weiss R. David Gallo Harris B. Winsberg Matthew G. Roberts	Parker, Hudson, Rainer & Dobbs LLP
Chicago Ins Co, Fireman's Fund Ins Co, and Westport Ins Corp (FKA Employers Reinsurance Corp)	Todd C. Jacobs John E. Bucheit	Parker, Hudson, Rainer & Dobbs LLP
Continental Casualty Company	Mark D. Plevin Miranda H. Turner Jordan A. Hess	Crowell & Moring LLP

	<b><u>INSURANCE COMPANY</u></b>	<b><u>ATTORNEY NAME</u></b>	<b><u>FIRM</u></b>
1			
2	First State Insurance Company	Joshua D. Weinberg Annette P. Rolain	Ruggeri Parks Weinberg LLP
3	First State Insurance Company	Michael W. Ellison	Smith Ellison
4	Pacific Indemnity Insurance Co.; Century Indemnity Company; Westchester Fire Insurance Company	Michael H. Torkin David Elbaum Andrew T. Frankel	SIMPSON THACHER & BARTLETT LLP
5		Pierce A. MacConaghy	
6			
7	St. Paul Fire and Marine Insurance Company and Travelers Casualty and Surety Company	Joshua Haevernick	Dentons US LLP
8	St. Paul Fire and Marine Insurance Company and Travelers Casualty and Surety Company, Employers Reinsurance Corporation, Appalachian Insurance Company, First State Insurance Company, and The Insurance Company of North America	Patrick C. Maxcy John Grossbart	Dentons US LLP
9			
10			
11			
12	St. Paul Fire and Marine Insurance Company and Travelers Casualty and Surety Company	Geoffrey M. Miller Lauren Macksoud	Dentons US LLP
13	St. Paul Fire and Marine Insurance Company and Travelers Casualty and Surety Company, Employers Reinsurance Corporation, Appalachian Insurance Company, First State Insurance Company, and The Insurance Company of North America	Keith Moskowitz	Dentons US LLP
14			
15			
16			
17	Travelers Indemnity Company		
18	St. Paul Surplus Lines		
19			
20	Westport Insurance Corporation, Formerly Known as Employers Reinsurance Corporation	Blaise S. Curet	Sinnott, Puebla, Campagne & Curet, APLC
21			
22	Westport Insurance Corporation, Formerly Known as Employers Reinsurance Corporation	Robin D. Craig	Craig & Winkelman LLP
23			
24			
25			
26			
27			
28			

**Exhibit 2**

**SCHEDULE OF INTERESTED PARTIES**

**The Debtor**

The Roman Catholic Archbishop of San Francisco, a California Corporation Sole

**Parishes and Missions**

All Hallows Chapel	St. Bartholomew Church
All Souls Church	St. Benedict Parish
Cathedral of St. Mary of the Assumption	St. Boniface Church
Church of the Assumption of Mary	St. Brendan Church
Church of the Epiphany	St. Bruno Church
Church of the Good Shepherd	St. Catherine of Siena
Church of the Nativity (Menlo)	St. Cecilia Church (San Francisco)
Church of the Nativity (San Francisco)	St. Cecilia Church (Lagunitas)
Church of the Visitacion	St. Charles Borromeo Church
Corpus Christi Church	St. Charles Church
Holy Angels Church	St. Denis Church
Holy Name of Jesus Church	St. Dominic Church
Immaculate Heart of Mary Church	St. Dunstan Church
Mater Dolorosa Church	St. Elizabeth Church
Mission Dolores Basilica	St. Emydius Church
Most Holy Redeemer Church	St. Finn Barr Church
Most Holy Rosary Chapel	St. Francis of Assisi
Notre Dame Des Victoires	St. Gabriel Church
Old St. Mary's Church	St. Gregory Church
Our Lady of Fatima Russian Byzantine Catholic	St. Helen Mission
Our Lady of Guadalupe Mission (Brisbane)	St. Hilary Church
Our Lady of Angels Church	St. Ignatius Church
Our Lady of Loretto Church	St. Isabella Church
Our Lady of Lourdes Church	St. James Church
Our Lady of Mercy Church	St. John the Evangelist Church
Our Lady of Mount Carmel Church (Mill Valley)	St. John of God Chapel
Our Lady of Mount Carmel Church (Redwood City)	St. Kevin Church
Our Lady of Perpetual Help	St. Luke Church
Our Lady of the Pillar Church	St. Mark Church
Our Lady of Refuge Mission	St. Mary Magdalene Mission
Our Lady of the Wayside	St. Mary Star of the Sea
Sacred Heart Church	St. Mary Church
San Jose Obero Church	St. Matthew Church
Shrine of St. Francis of Assisi	St. Matthias Church
St. Agnes Church	St. Michael Korean Church
St. Andrew Church	St. Monica Church
St. Anne of the Sunset Church	St. Patrick Church (Larkspur)
St. Anselm Church	St. Patrick Church (San Francisco)
St. Anthony Church (Menlo Park)	St. Paul Church
St. Anthony Mission (Pescadero)	St. Paul of the Shipwreck
St. Anthony of Padua Church (Novato)	St. Peter Church (Pacifica)
St. Anthony of Padua Church	St. Peter Church (San Francisco)
St. Augustine Church	St. Philip the Apostle
	St. Pius Church
	St. Raphael Church
	St. Raymond Church
	St. Rita Church

1 St. Robert Church  
St. Sebastian Church  
2 St. Stephen Church  
St. Teresa Church  
3 St. Thomas Apostle Church  
St. Thomas More Church  
4

St. Timothy Church  
St. Veronica Church  
St. Vincent de Paul Church  
Star of the Sea Church  
Sts. Peter & Paul Church

**Schools**

5 Archbishop Riordon High School  
Convent of the Sacred Heart High School  
6 ICA Cristo Rey Academy  
Junipero Serra High School  
7 Marin Catholic High School  
Mercy High School  
8 Notre Dame High School  
Sacred Heart Cathedral Preparatory  
9 Sacred Heart Preparatory (Atherton)  
St. Ignatius College Preparatory  
10 Stuart Hall High School  
Woodside Priory High School  
11

**Other Entities**

12 Archdiocese of San Francisco Parish, School and Cemetery Juridic Persons Capital Assets Support Corporation  
13 Archdiocese of San Francisco Parish and School Juridic Personal Real Property Support Corporation  
14 Benedict XVI Institute for Sacred Music and Divine Worship  
The Roman Catholic Seminary of San Francisco  
15 Catholic Charities CYO of the Archdiocese of San Francisco  
Capuchin Franciscan Order  
16

**Leadership and Officers**

17 Most Rev. Salvatore J. Cordileone, Bishop and Chief Executive Officer  
Rev. Stephen H. Howell, Vicar General  
18 Rev. Patrick J. Summerhays, Moderator of the Curia  
Paula F. Carney, Esq., General Counsel  
19 Joseph Passarello, Chief Financial Officer  
Grace Lee, Controller  
20

**Banks/Investment Mgmt Firms**

21 Bank of America  
Bank of San Francisco  
22 BlackRock  
Bridge Bank (Western Alliance Bank)  
23 California Bank & Trust  
Charles Schwab  
24 City National Bank  
First Republic Bank  
25 JPMorgan Chase  
Segal Bryant Hamilton  
26  
27  
28

1 **Coverage Providers and Brokers**

2 AIG  
3 Allianz Reinsurance America, Inc.  
4 Allied World  
5 American Home Assurance  
6 Appalachian Insurance Co.  
7 Arthur J. Gallagher & Co.  
8 Chicago Insurance Company  
9 Chubb Insurance Company North America  
10 CNA  
11 Employers Re  
12 Fireman's Fund  
13 First State Insurance Co.  
14 Industrial Underwriters  
15 National Catholic  
16 Old Republic  
17 Pacific Indemnity  
18 Lloyd's, London  
19 The Hartford  
20 The Ordinary Mutual  
21 Travelers  
22 Western Catholic Insurance Company

23 **Certain Ordinary Course Professionals**

24 Baker Tilly US LLP  
25 Best Best & Krieger LLP  
26 CliftonLarsonAllen LLP  
27 Duane Morris LLP  
28 Fiumara & Milligan Law, P.C.  
29 Grant Thornton LLP  
30 Jackson Lewis PC  
31 Law Offices of Eloise M. Rosenblatt  
32 Lewis Roca Rothgerbger Christie LLP  
33 Littler Medelson, PC  
34 Macdonald Fernandez LLP  
35 Magna Legal Services  
36 Runde & Partners, Inc.  
37 Weinstein & Numbers LLP  
38 Weintraub Tobin  
39 Woodburn & Wedge

1 **Parties to Litigation<sup>1</sup>**

2 **Counsel to Litigation Parties**

3 Alder Law  
4 Allen, Glaessner, Hazelwood & Werth, LLP  
5 Andrews & Thornton  
6 Arias, Sanguinetti, Wang & Torrijos, LLP  
7 Aylstock, Witkin, Kreis & Overholtz, PLLC  
8 Baron & Budd, P.C.  
9 Boucher LLP  
10 Casper, Meadows, Schwartz & Cook  
11 DiMarco, Araujo Montevideo  
12 Donahoo & Associates PC  
13 Edwards & de la Cerda  
14 Etsey & Bomberger  
15 Fiore Achermann  
16 Fisher Law Offices  
17 Fiumara Law, PC  
18 Foley & Mansfield  
19 Forester Haynie  
20 Furtado, Jaspovice & Simons  
21 Gomez Trial Attorneys  
22 Gross & Belsky P.C.  
23 Herman Law  
24 Hurley McKenna & Mertz, P.C.  
25 Jeff Anderson & Associates  
26 Joel Bieber Firm  
27 Joseph George Jr. Law Corporation

KBM Law  
Ketterer, Browne & Associates, LLC  
Law Office of Mark Webb  
Liakos Law, APC  
M. Jean Starcevich, Esq.  
Manly, Stewart & Finaldi  
Mary Alexander & Associates  
Matthews & Associates  
Mezzetti Law Firm  
Nye Sterling Hale Miller & Sweet LLP  
Panish, Shea, Boyle, Ravipudi, LLP  
Paul Mones, P.C.  
Pearson Simon & Warshaw LLP  
Peiffer Wolf Carr Kane Conway & Wise  
Pfau Cochran Vertetis Amala PLLC  
Reich Binstock  
Ribera Law Firm  
Saunders & Walker P.A.  
Schmidt National Law Group  
Slater, Slater, Schulman LLP  
Thompson Law Offices, PC  
TLO Law, P.C.  
Van Blois & Associates  
Wagstaff Law Firm  
Winer, Burritt, & Scott, LLP  
Zalkin Law Firm

16 **Parties to Contracts with the Debtor**

17 Adana Tours LLC  
18 ARAMARK Sports and Entertainment  
19 Services, LLC  
20 Arthur J. Gallagher & Co.  
21 Benefit Allocation Systems, LLC  
22 EVERFI, Inc  
23 Fivable, LLC  
24 FOCUS  
25 GDR Group  
26 ImageSource  
27 Intersection Media, LLC

Jerome S. Burstein, Ph.D.  
Luxe Cruises and Events  
Mangia Nosh Catering Company  
Marin Catholic High School  
McCleskey Construction Company  
Peter Marlow  
Rite Aid Hdqtrs. Corp.  
Sacred Heart Cathedral Preparatory  
Stewardship Planned Giving  
TPX Communications  
Trinity Building Services

22 **Restructuring Professionals**

23 Donlin, Recano & Company, Inc.  
24 Felderstein, Fitzgerald, Willoughby, Pascuzzi & Rios LLP  
25 Sheppard Mullin Richter & Hampton LLP  
26 GlassRatner Advisory & Capital Group LLC d/b/a B. Riley Advisory Services

26 <sup>1</sup> The names of certain individual plaintiffs are redacted consistent with the Debtor's *Motion for*  
27 *Entry of Interim and Final Orders (I) Authorizing and Approving Special Noticing and*  
28 *Confidentiality Procedures, (II) Authorizing and Approving Procedures for Providing Notice of*  
*Commencement, and (III) Granting Related Relief.* The Debtor will provide an unredacted version  
of this list to the Court, the Office of the United States Trustee, and any official committees  
appointed in this chapter 11 case upon request.

1 **Significant Utility Providers**

2 Allstream  
3 AT&T Mobility  
4 AT&T Teleconference Services  
5 City Of Santa Rosa  
6 Comcast  
7 Mitel  
8 Pacific Gas & Electric  
9 Penngrove Water  
10 TPX Communications

11 **Taxing Authorities**

12 Arizona Department of Revenue  
13 California Dept of Tax and Fee Administration  
14 Florida Department of Revenue  
15 Kern County Treasurer - Tax Collector  
16 Marin Countyh Office of the Assessor-Recorder  
17 New Mexico Taxation and Revenue Department  
18 San Francisco Tax Collector  
19 San Francisco Tax Collector  
20 San Mateo County Clerk – Recorder

21 **Government Agencies**

22 California Department of Justice  
23 California Department of Motor Vehicles  
24 California State Controller  
25 City and County of San Francisco  
26 Colorado Department of Revenue  
27 Georgia Department of Revenue Processing Center  
28 San Francisco Assessor-Recorder  
San Francisco County Clerk  
San Francisco Dept of Public Health  
U.S. Department of Homeland

29 **Attorneys and Staff for the United States Trustee's Office for the Northern District of California, San Francisco Office**

30 Tracy Hope Davis  
31 Christina Goebelsmann  
32 Ianthe V. Del Rosario  
33 Gem Mil Langit  
34 Nychelle G. Rivera  
35 Yung Nor Wong